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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:  
  
ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**AGENDA AND JOINT STATEMENT  
FOR APRIL 23, 2025, CASE  
MANAGEMENT CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Case Management Order (“CMO”) No. 1 (ECF 75), the Parties submit this agenda and joint statement in advance of the April 23, 2025 Case Management Conference (“CMC”).

## **I. Agenda for Case Management Conference**

Pursuant to CMO 18, the Parties offer the below proposed agenda for the CMC scheduled for April 23, 2025:

- Motions in Insurance Coverage Actions
  - Meta’s Motion to Stay/Suspend Insurance Coverage Litigation
  - Insurers’ Motion to Dismiss or Stay in Favor of First-Filed Delaware Action
  - Hartford’s and Chubb’s Motions to Remand
- Process and format for trial bellwether briefing due May 23, 2025

## **II. Joint JCCP Update**

Judge Kuhl held a JCCP CMC on April 15, 2025. The next JCCP CMC is set for May 5, 2025. At the April 15 CMC, Judge Kuhl considered the parties’ positions with respect to a number of issues, including (1) the time JCCP plaintiffs whose Plaintiff Fact Sheets (“PFSs”) are overdue will have to submit PFSs before the Court will issue orders to show cause why their cases should not be dismissed; (2) JCCP plaintiffs’ potential amendment of short form complaints to assert non-product negligent failure-to-warn claims; (3) the progress of the bellwether (“BW”) plaintiffs’ document productions, including Defendants’ requests for substantive user content from the BW plaintiffs’ devices; (4) the identification of treating healthcare providers whom the BW plaintiffs may rely on for their claims; (5) scheduling for Bellwether Trial Pools 2 and 3; (6) procedures for providing Defendants with information regarding JCCP plaintiffs’ forensic collections in light of allegations regarding the qualifications of the founder and now former Chief Technology Officer for JCCP plaintiffs’ collection and forensic imaging discovery vendor.

During the hearing, Judge Kuhl also informed the Parties that while she was not prepared to issue an order on the trial and discovery schedules for Bellwether cases in Trial Groups 2 and 3, she intended to address those issues at the next CMC on May 5. Likewise, certain Bellwether cases were separated into a separate track for summary judgment briefing to test common issues including statutes

1 of limitation and Section 230. Judge Kuhl asked the parties to confer on a schedule for briefing on those  
2 issues. Judge Kuhl also received updates with respect to the dismissal of school district cases following  
3 her order lifting the stay applicable to those cases. A Minute Order from Judge Kuhl on these issues is  
4 still pending as of the filing of this CMC Statement, but will be submitted to Judge Gonzalez Rogers by  
5 email before the CMC to the extent it is issued before April 23.

6 Judge Kuhl also heard arguments at the April 15 conference about selecting BW plaintiffs for the  
7 Bellwether Trial Pools and sequencing those cases for trial. She selected nine cases to be set for trial  
8 across three trial pools, with the first trial from Trial Pool 1 set to begin November 25, 2025. Following  
9 this hearing, the period of further fact discovery on the three Trial Pool 1 plaintiffs commenced, and will  
10 close on May 23, 2025. The JCCP parties will exchange General Causation expert reports on April 18,  
11 2025, with opening briefs on *Sargon* motions challenging General Causation expert opinions due July  
12 28, 2025. All other expert reports for the Trial Pool 1 Bellwether cases (including specific causation  
13 expert reports) are due June 6, 2025, with *Sargon* motions challenging those opinions due August 29,  
14 2025.

### 15 **III. Joint Discovery Update**

16 A copy of the following discovery-related submissions and orders, which were (or will by the  
17 next MDL CMC have been) filed or issued since the last MDL CMC Statement was filed, will be sent  
18 by email to Judge Gonzalez Rogers after this CMC Statement is filed:

- 19 ● Meta's Administrative Motion for Leave to File Supplemental Briefing on Former Employees  
20 Arturo Bejar and Vaishnavi Jayakumar's Objections to Meta's Document Subpoenas in Lieu of  
21 Proposed Order (ECF 1815) and Former Employees' Opposition/Response (ECF 1837)
- 22 ● Joint Discovery Letter Brief Re Deposition of Felicia Cannon (*Mullen*) (ECF No. 1829)
- 23 ● Order Resolving Joint Discovery Letter Brief Re YouTube's Amended Rule 26(a) Initial  
24 Disclosures (ECF 1840)
- 25 ● Order Granting Stipulation Between PI/SD Plaintiffs and YouTube Requesting Additional Time  
26 for Completion of Certain Fact Discovery (ECF 1844)
- 27
- 28

- Stipulation Between State AGs and Meta Re Dispute Re Meta’s Amended Rule 30(b)(6) Notice to State Plaintiffs Asserting Consumer Protection and/or COPPA Claims (ECF 1858)
- Order Granting Stipulation Between PI/SD Plaintiffs and YouTube Re Production of Custodian Files from Jennifer Flannery O’Connor and K.K., Requests for Production Set 12, and Non-Custodial Sources (ECF 1861)
- Order Granting State AGs’ Motion for Extension of Time to Move to Compel Response to Outstanding Rule 45 Subpoena Issued to Mindshare Media, Ltd. (ECF 1862)
- Order Resolving Joint Letter Brief Re Meta’s Rule 30(b)(6) Depositions of COPPA-Only States (ECF 1864)
- Order Granting Stipulation Between the California Governor’s Office of Business and Economic Development (“GO-Biz”), Meta, and Snap Re Meta’s Document Request to GO-Biz Re Tax Credits (ECF 1869)

#### **IV. Other Joint Updates**

##### **A. Appeals**

##### **1. Collateral Order Appeals**

On March 3, 2025, the Ninth Circuit denied the State AGs’ and PI/SD Plaintiffs’ motions to dismiss Meta’s and TikTok’s appeals, and denied Meta and TikTok’s cross-motion to dismiss the State AGs’ and PI/SD Plaintiffs’ cross-appeals, without prejudice to both sides renewing jurisdictional arguments in the merits briefing. The Ninth Circuit also set a consolidated merits briefing schedule. Pursuant to that schedule, on March 31, 2025, Meta filed its opening merits brief, and TikTok filed a joinder. On April 2, 2025, the State AGs sought a “streamlined” 30-day extension of the deadline to file their opening brief on cross-appeal and response to Meta’s opening brief. The Ninth Circuit granted the extension request and amended the briefing schedule for all parties as follows: “Cross Appeal Second Brief Due (Appellee) 5/30/2025, Cross Appeal Third Brief Due (Appellant) 6/30/2025. Optional Cross Appeal Reply Brief due 21 days after service of Cross Appeal Third Brief.”

##### **2. Writ of Mandamus by California AG re Agency Discovery Order**

On March 26, 2025, the Ninth Circuit ordered Meta to answer California’s writ of mandamus to direct this Court to grant the State AGs’ objection to Magistrate Judge Kang’s state agency discovery

1 order (ECF 1621-1), including by addressing California’s request for a stay. Order, *In re The People of*  
2 *the State of California*, No. 25-584 (9th Cir.) (Dkt. 36). The Ninth Circuit also invited this Court to address  
3 the petition “if it so desires,” and directed that the petition be placed on the next available calendar. *Id.*  
4 Meta filed its Answer on April 9, 2025. See Answer, *In re The People of the State of California*, No. 25-  
5 584 (9th Cir.) (Dkt. 44). The California AG filed its reply on April 16, 2025.

6 **B. Meta and State AGs**

7 **1. Stipulation and Amended Complaint re COPPA-Only Transition**

8 Seven States are negotiating the terms of the dismissal of their state law claims against Meta, which  
9 would leave only their COPPA claims: Arizona, Hawai’i, Ohio, Oregon, Maine, Rhode Island, and  
10 Washington. The Parties are hoping to finalize their agreement by the April 23, 2025 CMC, and will ask  
11 the District Court to enter it.

12 **2. Anticipated Request for Extension of AG-Specific Expert Deadlines**

13 The State AGs and Meta are discussing an anticipated request to extend the expert deadlines for  
14 certain AG-specific expert reports relating to (1) remedies for consumer protection act and COPPA  
15 violations, (2) liability under COPPA, and (3) liability under consumer protection acts. The Parties hope  
16 to finalize any joint request for an extension by the April CMC.

17 **3. Update on Missouri Dismissal Order**

18 In the March 14 DMC Statement, Missouri reconfirmed that it “has agreed in principle to dismiss  
19 its case subject to the Parties’ memorializing their agreement in writing, as previously reported to the  
20 Court.” ECF 1767 at 2. The Parties will provide an update on Missouri’s dismissal at the April 22, 2025  
21 DMC.

1 Respectfully submitted,

2 DATED: April 16, 2025

By: /s/ P. Warren

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**ATTESTATION**

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 16, 2025

By: /s/ Previn Warren